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COPY # 35

LOGSHEET FOR FIELD CHANGES TO CONTROLLED DOCUMENTS

Change Number	Date	Document Number	Document Title	Section/Page Modified	Description of Change (s)	Resp. Manager Approval	Compliance Approval	ES&H Approval	Rad. Eng. Approval	Quality Assurance	Completion of ADM 2.01 Checklist	Completion of SES/USQD Checklist
4	8/19/97	RF/RMRS-96-0060	Final Sampling and Analysis plan to Support the Source Removal at the Mound Site, IHSS 113	3/14	Replace d to ff for the 2nd. bullet on page 14 section 3.3.2	[signature]	N/A [initials]	MDS	[signature]	[initials]	[initials]	[initials]

ADMIN RECORD

I113-A-00029

3.3.2 Spent HEPA/HEAF Sampling

Spent HEPA and HEAF filters are expected to be slightly radioactive and contain trace levels of VOCs after use in the TDU system. Under the RCRA derived-from rule 6 CCR 1007-3, 261.3(c)(2)(i), the spent filters will be considered hazardous remediation waste. Though hazardous, these filters are expected to meet the RCRA land disposal restriction (LDR) requirements, therefore, they should not require treatment prior to disposal. The filters are expected to be disposed as LDR-compliant low level-mixed waste at the Envirocare of Utah, Inc., facility in Clive, Utah. The filters will have to meet the WAC contained in the facilities Customer Information Manual (Envirocare, 1996). The WAC requires that all chemical analysis be conducted at a Utah Department of Health, Division of Laboratory Services, certified laboratory (Note: this is not required for geotechnical or radiochemical analyses). Table 3-5 lists the analytical parameters necessary to evaluate the filters with respect to the WAC. Samples from HEAF/HEPAs are expected to be collected by cutting "coupons" from the filters using conventional scissor type cutters or a sawzall tool. These coupons will be placed directly in the appropriate sample containers described in the following table.

To meet the timely disposition requirements of this project, worst-case samples will be collected of the HEAF/HEPA filters prior to completion of the treatment phase of the project. Because of different filtration characteristics, one sample will be collected from the "worst case" HEAF material and one sample will be collected from the "worst case" HEPA filter(s). A number of factors should insure the collection of worst case samples. These are:

1) The most contaminated soil (soil from near the surface of the Mound Site excavation) will be treated first (filters in place during this treatment will be sampled),
2) The samples will be collected from the HEPA filter media in place during the treatment of the "worse case" contaminated material. Based on the results of these "worst case" samples, later HEPA filters that are changed out will be sampled only if they are suspected of being contaminated worse than the first filters, i.e. if differential pressures reach the maximum allowed limit, nine inches of water or if there is visible evidence of loading on the filters upon removal.
3) If the same type of filters are used in series, the sample will come from the first inline filter of that type
4) Unlike the HEPA filters which are expected to remain in place during the treatment of several hundred cubic yards of soil, the HEAFs may require change out several times per day. As such, the sample will be collected by sampling a composite of the changed out HEAF material generated up to the point of first HEPA filter change out. This method will provide a relatively representative sample while still being biased toward "worst case" HEAF contaminant concentrations (e.g., for VOCs), and will be sufficient to meet the Envirocare WAC.
5) It is anticipated that downstream HEPA filters will not be changed out until removed at the conclusion of the project. These filters will have negligible particulate contamination because of the upstream HEPA filters. However, to verify that VOC levels are not above LDR treatment standards one sample will be taken for VOC analysis from the downstream HEPAs.

Field Change #4 8/19/97

Field Change #3 7/31/97